To: Klevs, Mardi[klevs.mardi@epa.gov]; Star, David[star.david@epa.gov]; Stedeford, Todd[Stedeford.Todd@epa.gov]; Lott, Don[Lott.Don@epa.gov]
Cc: Baney, Tony[Baney.Tony@epa.gov]
From: Sullivan, Greg
Sent: Wed 5/11/2016 6:07:33 PM
Subject: RE: Sky Valley School - PCB Air Testing Data and Potential Health Risk

Thanks

From: Klevs, Mardi
Sent: Wednesday, May 11, 2016 2:04 PM
To: Sullivan, Greg <Sullivan.Greg@epa.gov>; Star, David <star.david@epa.gov>; Stedeford, Todd <Stedeford.Todd@epa.gov>; Lott, Don <Lott.Don@epa.gov>
Cc: Baney, Tony <Baney.Tony@epa.gov>
Subject: RE: Sky Valley School - PCB Air Testing Data and Potential Health Risk

Ex. 5 - Deliberative Process/ACP

<< OLE Object: Picture (Device Independent Bitmap) >>

Mardi Klevs, Chief
Chemicals Management Branch (LC-8J)
Land and Chemicals Division
U.S. Environmental Protection Agency
77 W. Jackson
Chicago, IL 60604
312-353-5490 (phone)
312-385-5528 (fax)
klevs.mardi@epa.gov

From: Sullivan, Greg
Sent: Wednesday, May 11, 2016 1:03 PM
To: Star, David <star.david@epa.gov>; Stedeford, Todd <Stedeford.Todd@epa.gov>; Lott, Don <Lott.Don@epa.gov>
Cc: Klevs, Mardi <klevs.mardi@epa.gov>; Baney, Tony <Baney.Tony@epa.gov>
Subject: RE: Sky Valley School - PCB Air Testing Data and Potential Health Risk

Dave -

Ex. 5 - Deliberative Process/ACP

Let us know.

Greg

From: Star, David
Sent: Wednesday, May 11, 2016 10:08 AM
To: Sullivan, Greg <Sullivan.Greg@epa.gov>; Stedeford, Todd <Stedeford.Todd@epa.gov>; Lott, Don <Lott.Don@epa.gov>
Cc: Klevs, Mardi <klevs.mardi@epa.gov>
Subject: FW: Sky Valley School - PCB Air Testing Data and Potential Health Risk
Importance: High

Enforcement Sensitive Information - Not to be Released

An update on R5's work in R10 regarding the school district in Monroe County Washington. This information is for you to simply keep you abreast of the "PCB Containing Building Materials in Schools" matter jointly being worked on.

Dave Star
PTCS/CMB/LCD/EPA R5
312-886-6009
(LC-8J)(08034)
<< OLE Object: Picture (Device Independent Bitmap) >>

From: Moore, Kendall
Sent: Wednesday, May 11, 2016 8:57 AM
To: Star, David <star.david@epa.gov>; Ramanauskas, Peter <ramanauskas.peter@epa.gov>; Klevs, Mardi <klevs.mardi@epa.gov>; Peachey, Robert <peachey.robert@epa.gov>
Subject: RE: Sky Valley School - PCB Air Testing Data and Potential Health Risk

We met with the school yesterday. The school reported that all the PCB light ballasts have been removed and all of the impacted light fixtures have been cleaned. The school's consultant will conduct verification sampling next week to ensure spill cleanup levels were met. Another round of air samples will also be collected to see if air levels have gone down.

EPA recommended that no children under 6 years old be allowed in areas where air sample results exceeded the recommended levels for children that age until air levels are reduced to safe levels for that age group. The County Health Dept. issued an order last week that states the same restriction.

The school verbally agreed to remove PCB caulk. Caulk removal will be done during the summer months and should be completed before school resumes in the fall of 2016. The school verbally agreed to these terms and now must:

1. Summarize the terms in an email (due by the end of the week)
2. Finalize the sampling and remediation plan including a remediation schedule (due May 25, 2016).

These are just general terms right now. The details will be worked out as the school provides information in writing that will allow for a formal response.

-----Original Appointment-----
From: Star, David
Sent: Wednesday, May 11, 2016 8:18 AM
To: Star, David; Moore, Kendall; Ramanauskas, Peter; Klevs, Mardi; Peachey, Robert
Subject: Sky Valley School - PCB Air Testing Data and Potential Health Risk
When: Wednesday, May 11, 2016 11:45 AM-12:15 PM (UTC-06:00) Central Time (US & Canada).
Where: CMB Branch Chief's Office

- What are our next steps so that the Washington school district moves quickly to clean up, now that we know there is a risk?

Dave Star
PTCS/CMB/LCD/EPA R5
312-886-6009
(LC-8J)(08034)

From: Mangino, Mario
Sent: Monday, May 09, 2016 2:09 PM
To: Moore, Kendall <moore.kendall@epa.gov>; Ramanauskas, Peter <ramanauskas.peter@epa.gov>; Klevs, Mardi <klevs.mardi@epa.gov>
Cc: Cisneros, Jose <Cisneros.Jose@epa.gov>; Beedle, Michael <beedle.michael@epa.gov>; Star, David <star.david@epa.gov>
Subject: Sky Valley School - PCB Air Testing Data and Potential Health Risk

DRAFT - DELIBERATIVE - FOR INTERNAL EPA REVIEW ONLY

I have spent some time reviewing the "Indoor Air Quality Assessment Report" for the Sky Valley Educational Center prepared by the testing consultant to the Monroe School District (Monroe, WA).

Based on our conference call last week with Region 10 and representatives from the local County Health Department, I believe we identified that one of EPA's immediate concern should focus on the potential for significance health risks from exposure to PCBs to children and staff at the Educational Center.

The sampling to date has discovered multiple sources of PCBs within the Educational Center which include the detection of PCBs in leaking and/or old fluorescent light ballasts, some wall paint samples, some carpet remnants, and some samples of caulk and sealants which were described as being located "in various areas throughout the campus." The sampling for PCBs in building materials is important for identifying sources of PCBs and determining sources and locations where PCBs are found to exceed TSCA standards for the presence of PCBs. However, those identifications of sources do not readily correlate themselves to a direct health risk assessment for PCBs. For evaluating health risk, we prefer to have data for a parameter more directly related to exposure to PCBs and/or the identification of a complete exposure pathway.

The data on PCB Air Testing is the parameter currently available for evaluating the potential for direct exposure to PCBs at the Educational Center. The data can be used for making a preliminary evaluation of PCB exposure and making some recommendations for preventing and reducing PCB exposure within the Educational Center.

PCB Air Testing (Pages 60-62)

This Section describes the sampling of PCBs in air samples within the Education Center.

- Air samples were collected at 68 locations which were well distributed across the Center and included samples from small classrooms, large classrooms, large use areas (gyms/locker rooms), common spaces, and administration offices. Samples were described as being collected and analyzed by EPA standard Method TO-10a.

- 13 of the 68 air samples were reported to have detectable concentrations of PCBs (total Aroclors). The detected concentrations ranged from 48 nanograms/cubic meter (ng/m^3) to 270 ng/m^3.

- EPA recommends comparison of results from PCB air concentration samples to a set of screening concentrations called Exposure Levels for Evaluation (ELEs). The ELEs correspond to air concentration levels that would not exceed an EPA Reference Dose level for PCB exposure taking into account sensitivity across different age ranges (i.e., young children through teenagers and adult staff) and using exposure frequency factors and exposure duration factors expected for the occupancy of school rooms at a typical school location. The results of the comparison can be used for making multiple recommendations, including: whether additional sampling should be undertaken, whether measures should be undertaken to reduce exposures, or to prevent exposures to specific age groups and/or to specific locations within a school building.

- The results of sampling indicated that PCB air concentrations exceeded the recommended ELE of 120 ng/m^3 for children In the 1-3 year age range at 7 locations identified on page 61 of the Report, where the detected concentrations ranged from 190 to 270 ng/m^3.

- The results of sampling also indicated that the PCB air concentration exceeded the recommended ELE of 200 ng/m^3 for children In the 3-6 year age range at 3 locations identified on page 61 of the Report, where the detected concentrations ranged from 210 to 270 ng/m^3.

Ex. 5 - Deliberative Process

Ex. 5 - Deliberative Process

Please contact me if any clarification is need on the presentation above.

Mario Mangino
Toxicologist
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77 West Jackson Blvd.
Chicago, IL 60604
312-886-2589

DRAFT - DELIBERATIVE - FOR INTERNAL EPA REVIEW ONLY